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2015 SEP 23 PM 12:10

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

MICHAEL D. GABOR,)	Case No. 1:10-cr-00387-SL-5
)	
Petitioner,)	Judge Sara Lioi
)	
vs.)	
)	
UNITED STATES OF AMERICA,)	
)	
Respondent.)	

MOTION FOR LEAVE TO EXCEED THE PAGE LIMITATION
SET FORTH IN RULE 7.1(f) OF THE LOCAL RULES
OF THE NORTHERN DISTRICT OF OHIO

Now comes Michael D. Gabor, Petitioner, *pro se* (the “Petitioner”), with his Motion for Leave to Exceed the Page Limitation Set Forth in Rule 7.1(f) of the Local Rules of the Northern District of Ohio (this “Motion”). The Petitioner expects to file a Motion to Vacate, Set Aside or Correct Sentence (the “2255 Motion”) in the next few weeks.¹ Pursuant to Rule 7.1(f), the page limitation for the memorandum of support of the 2255 Motion is currently thirty pages because the Petitioner’s case is a complex case. *See* Rule 7.1(f). The Petitioner is hereby respectfully requesting to have this page limitation increased to fifty (50) pages for all of the reasons more fully set forth herein.

¹ The Petitioner’s due date for the 2255 Motion is November 9, 2015.

The Petitioner seeks leave of this Honorable Court to exceed the page limitation set forth in Local Rule 7.1(f) for the following reasons:

(1) The Petitioner is *pro se* and is not an expert in legal matters. Therefore, he anticipates that he will be less concise in setting forth certain legal authorities and issues than an attorney.

(2) The underlying matter is extremely complex as this Honorable Court is aware. The Cuyahoga County Public Corruption Investigation (the "Investigation") entailed approximately one decade of investigation involving hundreds of people, interviews and companies. The Petitioner's trial was over two months long which is extremely rare for a criminal case. The number of witnesses, the amount of evidence, the amount of discovery and the number of legal issues involved all militate in favor of allowing the Petitioner to exceed the page limitation. In fact, it was widely reported that this matter was the biggest criminal matter in recent history in Ohio.

(3) The Petitioner received a 121 month term of imprisonment so the stakes are extremely high and, therefore, the Petitioner seeks to exhaust all issues in the 2255 Motion.

The Petitioner is aware that this Honorable Court needs sufficient time to rule on this Motion before the 2255 Motion is filed. Therefore, the Petitioner is filing this Motion well in advance of the due date for the 2255 Motion.

For all of the foregoing reasons, the Petitioner respectfully requests that this Honorable Court grant this Motion. The Petitioner anticipates that the 2255 Motion will be approximately fifty (50) pages in length.

Respectfully submitted,



Michael D. Gabor, Petitioner, *pro se*
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CERTIFICATE OF SERVICE

A copy of the foregoing *Motion for Leave to Exceed the Page Limitation Set Forth in Rule 7.1(f) of the Local Rules of the Northern District of Ohio* has been sent by regular U.S. Mail, first class, postage prepaid, this 18 of SEPTEMBER, 2015.

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Michael D. Gabor, Petitioner, *pro se*